(c) <u>REMARKS</u>

The claims are 1 and 5-19 with claims 1, 8, 13, 14 and 15 being independent. The claims have been amended to include the subject matter of claim 4. Reconsideration of the claims is expressly requested.

Claims 1-3 and 7 were rejected as anticipated by Van Damme '986. Claims 1-12 and 15-19 were rejected as obvious over Kubota '107 in view of Imai '914. Claims 13 and 21 were deemed obvious over Kubota '107 in view of Imai '912 and further in view of Ohkuma, '112. Claim 14 was rejected as obvious over Kubota '107 in view of Imai '914 and further in view of Kubota '643. Finally, claim 20 was rejected as either anticipated by or as obvious over, Ohkuma '112. The grounds of rejection as recited on pages 2-17 of the Official Action are respectfully traversed.

The anticipation rejection of claims 1-3 and 7 based on Van Damme '986 has been obviated by the inclusion of the subject matter of claim 4 into claim 1. The rejections of claims 20 and 21 have been rendered moot by their cancellation.

The obviousness rejection of claims 1-19 will be discussed hereafter. The Examiner notes Kubota '107 fails to disclose that the positive working photosentive material comprises a compound that generates acid when irradiated with light. Imai is said to disclose an acid-generating agent in paragraphs [0097-0105 and 0110].

In Imai '914 the positive photosensitive resin composition has a base copolymer, an-ether-bond-containing olefinic unsaturated compound and an acid-generating agent. As seen on paragraph [0110] upon heating, carboxyl groups in the copolymer and ether groups in the unsaturated compound form a cross-linked structure via

an addition reaction to make the film insoluble. Later, by irradiating and heating, acid is generated which cleaves the cross-linked structure.

having an anhydride type cross-liked structure is quite different in kind from the complex cross-linked structure of Imai which is formed by reacting carboxylic acid groups in the copolymer with vinyl groups of a structure containing an ether bond. Imai employs a complex copolymer, for example, a copolymer of a phenol substituted methacrylate ester and a phenol-substituted acrylic acid. This copolymer is then cross-linked with vinyl groups of a condensation product of (a) a polyphenol or polyol with (b) a halogenated-alkylvinyl ether [0092]. Such a cross-linked complex compound is different in kind from the instant acrylic cross-linked resins of formulas 1 or 2. The Imai cross-linked polymer is formed, therefore, by cross-linking the carboxylic groups of (a) the copolymer of a phenol-substituted methacrylate ester and a phenol-substituted acrylic acid with (b) vinyl groups of a condensation product of a polyphenol (or polyol) and a halogenated alkylvinyl ether.

The acid generated in Imai accordingly, cleaves a far different cross-linked complex than in the present claimed invention producing different type products. The present acid-induced decomposition produces a cleaved carboxylic anhydride and a main chain cleavage. Such products are quite different from those in Imai. One would not be motivated to combine Kubota with Imai based on their different structures.

Therefore, it is submitted that none of the references, whether alone or in combination, disclose or suggest the present claimed invention or render it unpatentable.

Accordingly, it is respectfully requested that the claims be allowed and the case be passed to issue.

Applicants' undersigned attorney may be reached in our New York office

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Respectfully submitted,

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